

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

J&J SPORTS PRODUCTIONS, INC.,)	
)	
Plaintiff,)	Case No. 08 CV 2570
v.)	
)	
JUAN BANDA, indiv. And d/b/a EL CORRAL)	Judge: Der-yeghiayan
NIGHT CLUB, INC., d/b/a EL CORRAL)	Magistrate Judge: Judge Keys
NIGHT CLUB and EL CORRAL NIGHT)	
CLUB, INC., d/b/a EL CORRAL NIGHT CLUB))	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR JUDGMENT

NOW COMES the Plaintiff, J&J SPORTS PRODUCTIONS, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court enter an order of Judgment against Defendant, JUAN BANDA, indv., and d/b/a EL CORRAL NIGHT CLUB, INC., and EL CORRAL NIGHT CLUB, INC., d/b/a EL CORRAL NIGHT CLUB, INC., in the amount of \$20,000.00, and in support thereof, states as follows:

1. That on April 8, 2009, this Honorable Court entered its Memorandum Opinion granting Plaintiff's Motion for Summary Judgment.
2. That this matter is brought pursuant to the Communications Act of 1934, 47 U.S.C. § 151 et seq. as amended by the Cable Communications Policy Act of 1984, 47 U.S.C. § 521 et seq and the Copyright Act of 1976, 17 U.S.C. §§ 101 et seq.;

That the aforesaid Act provides for statutory liquidated damages to wit:

- a) Sixty Thousand (\$60,000.00) Dollars for each violation of Section 553 of the Cable Communications Act;
- b) One Hundred Ten Thousand (\$110,000.00) Dollars for each violation of Section 6504 of the Copyright Act;

3. That in the instant matter, there were three (3) violations of the aforesaid provisions of the Cable Communication Act; See the Affidavit of the Investigator, attached

hereto and made a part hereof, marked "Plaintiff's Exhibit A;"

4. That Plaintiff is therefore entitled to Twenty Thousand and 00/100 (\$0,000.00) Dollars as Statutory liquidated damages.

5. That Plaintiff is further entitled to Three Thousand Fifty Six and 25/100 (\$3,056.25) Dollars for attorney's fees and costs; See Affidavit of Plaintiff's Counsel, Zane D. Smith, attached hereto and made a part hereof, marked "Plaintiff's Exhibit B."

6. That Plaintiff is entitled to statutory damages, in the amount of \$20,000.00 plus attorneys and fees and costs of \$3,056.25 totaling \$23,056.25.

WHEREFORE, the Plaintiff, J&J SPORTS PRODUCTIONS, INC., respectfully prays this Honorable Court for the entry of an Order of Judgment in Plaintiff's favor and against the defendants, EDMUNDO CUELLO, individually and THE COCKTAIL BAR, INC., d/b/a FUGGEDABOUDIT in the amount of amount of \$23,056.25 and for such other relief for the Plaintiff as this Court deems just and right.

Respectfully submitted,

ZANE D. SMITH & ASSOCIATES, LTD.

By: /s/ Andre Ordeanu
Zane D. Smith, Plaintiff's Attorney

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